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U.S. DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
CLEVELAND

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

JOSHUA WATKINS,

Defendant.

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**1 15 CR 330**  
CASE NO. **1 15 CR 330**  
Title 18, Section 1956(h), United  
States Code

**JUDGE GWIN**

COUNT 1

The United States Attorney charges:

From on or about June 2013 through February 2015, in the Northern District of Ohio, Eastern Division, and elsewhere, the Defendant, JOSHUA WATKINS, and James Sorgi, Stuart Pflaum, Dino Silvestri, Fred Bagi (named but not charged herein), and others did knowingly combine, conspire, and agree with each other and with other persons known and unknown to commit offenses against the United States in violation of Title 18, United States Code, Section 1956, to wit: to knowingly conduct and attempt to conduct financial transactions affecting interstate commerce and foreign commerce, which transactions involved the proceeds of specified unlawful activity, that is, distribution of marijuana, a Schedule I controlled substance, in violation of Title 21 United States Code, § 841(a)(1), knowing that the transactions were designed in whole or in part to conceal and disguise the nature, location, source, ownership, and

control of the proceeds of specified unlawful activity, and that while conducting and attempting to conduct such financial transactions, knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

**MANNER AND MEANS**

The manner and means used to accomplish the objectives of the conspiracy included, among others, the following:

A. James Sorgi organized, directed, managed, and operated a drug trafficking organization (hereinafter referred to as the SORGI DTO) that imported marijuana from California into the Northern District of Ohio for distribution. Sorgi also organized, managed, and operated a money laundering organization (hereinafter referred to as the SORGI MLO) that laundered the proceeds of the DTO's marijuana sales.

B. James Sorgi used marijuana growers in Northern California to grow marijuana for his DTO.

C. James Sorgi directed members of his DTO in California to ship multi-pound quantities of marijuana from California to the Northern District of Ohio via the United States Mail. Dino Silvestri and other SORGI DTO members shipped marijuana from California to Ohio via the United States Mail.

D. James Sorgi also arranged to have members of his DTO drive marijuana from California to Ohio for distribution.

E. James Sorgi directed JOSHUA WATKINS and other members of his DTO in the Northern District of Ohio to receive the packages of multi-pound quantities of marijuana from members of his DTO in California. When the marijuana arrived in Ohio, Stuart Pflaum and other

members of the SORGI DTO collected the marijuana packages and sold the marijuana in the Northern District of Ohio.

F. James Sorgi directed JOSHUA WATKINS and other members of his MLO to store marijuana proceeds for him in the Northern District of Ohio. Stuart Pflaum provided marijuana proceeds to members of the SORGI MLO to store on Sorgi's behalf.

G. James Sorgi directed JOSHUA WATKINS and other members of his MLO in California and elsewhere to use their bank accounts and the bank accounts of others, to funnel marijuana proceeds from Ohio to California. Sorgi directed WATKINS, Fred Bagi, and other members of his MLO in Ohio to make cash deposits of marijuana proceeds into these accounts. At Sorgi's direction, these MLO members made deposits into these accounts in amounts less than \$10,000 each to avoid detection by law enforcement.

H. James Sorgi directed JOSHUA WATKINS to travel to Indiana with other members of the MLO to deposit marijuana proceeds into the SORGI MLO funnel accounts.

I. Stuart Pflaum provided the marijuana proceeds to WATKINS and others to deposit into the SORGI MLO funnel accounts. Sorgi instructed WATKINS as to the names, accounts numbers, amounts, and banks to use for the deposits.

J. James Sorgi arranged for JOSHUA WATKINS to travel to California to withdraw the marijuana proceeds from WATKINS's bank account. At Sorgi's direction, WATKINS and other members of the SORGI MLO withdrew the deposited marijuana proceeds from their bank accounts in California. WATKINS gave the cash proceeds to Sorgi.

**ACTS IN FURTHERANCE OF THE CONSPIRACY**

In furtherance thereof, and to effect the goals and conceal the existence of the conspiracy, the Defendant and others performed acts in furtherance of the conspiracy in the Northern District of Ohio and elsewhere, including but not limited to the following:

1. On August 19, 2013, JOSHUA WATKINS received two packages at an address on Old Pleasant Valley Road in Middleburg Heights, Ohio, via the United States Mail that contained multi-pound quantities of marijuana from the SORGI DTO in California. Stuart Pflaum collected the marijuana packages from WATKINS.
2. On August 22, 2013, JOSHUA WATKINS received a package at an address on Old Pleasant Valley Road in Middleburg Heights, Ohio, via the United States Mail that contained multi-pound quantities of marijuana from the SORGI DTO in California. Stuart Pflaum collected the marijuana packages from WATKINS.
3. On September 6, 2013, JOSHUA WATKINS received a package at an address on Old Pleasant Valley Road in Middleburg Heights, Ohio, via the United States Mail that contained multi-pound quantities of marijuana from the SORGI DTO in California. Stuart Pflaum collected the marijuana packages from WATKINS.
4. On September 13, 2013, in Strongsville, Ohio, JOSHUA WATKINS deposited \$7,450 of marijuana proceeds into his Chase Bank account. Stuart Pflaum provided WATKINS the proceeds for deposit.
5. On September 14, 2013, in Millbrae, California, JOSHUA WATKINS withdrew \$7,450 of marijuana proceeds from his Chase Bank account. WATKINS gave the cash proceeds to James Sorgi.

6. On September 16, 2013, in Bedford Heights, Ohio, Fred Bagi deposited \$8,850 of marijuana proceeds into JOSHUA WATKINS' Chase Bank account.

7. On September 16, 2013, in Burlingame, California, JOSHUA WATKINS withdrew \$8,850 of marijuana proceeds from his Chase Bank account. WATKINS gave the cash proceeds to James Sorgi.

8. On September 21, 2013, JOSHUA WATKINS received a package at an address on Old Pleasant Valley Road in Middleburg Heights, Ohio, via the United States Mail that contained multi-pound quantities of marijuana from the SORGI DTO in California. Stuart Pflaum collected the marijuana from WATKINS.

9. On October 18, 2013, JOSHUA WATKINS received a package at an address on Pleasant Valley Road in Middleburg Heights, Ohio, via the United States Mail that contained multi-pound quantities of marijuana from the SORGI DTO in California. Stuart Pflaum collected the marijuana from WATKINS.

10. On October 24, 2013, JOSHUA WATKINS received a package at an address on Pleasant Valley Road in Middleburg Heights, Ohio, via the United States Mail that contained multi-pound quantities of marijuana from the SORGI DTO in California. Stuart Pflaum collected the marijuana from WATKINS.

11. On October 25, 2013, JOSHUA WATKINS received a package at an address on Old Pleasant Valley Road in Middleburg Heights, Ohio, via the United States Mail that contained multi-pound quantities of marijuana from the SORGI DTO in California. Stuart Pflaum collected the marijuana from WATKINS.

12. On November 1, 2013, in California, Dino Silvestri attempted to send 5 pounds of marijuana to JOSHUA WATKINS at an address on Old Pleasant Valley Road in Middleburg Heights, Ohio, via the United States Mail.

13. On November 12, 2013, JOSHUA WATKINS received a package at an address on Old Pleasant Valley Road in Middleburg Heights, Ohio, via the United States Mail that contained multi-pound quantities of marijuana from the SORGI DTO in California. Stuart Pflaum collected the marijuana from WATKINS.

14. On January 27, 2014, JOSHUA WATKINS received a package, under the fictitious name "Joe Smith," at an address on Old Pleasant Valley Road in Middleburg Heights, Ohio, via the United States Mail that contained multi-pound quantities of marijuana from the SORGI DTO in California. Stuart Pflaum collected the marijuana from WATKINS.

All in violation of Title 18, Section 1956(h), United States Code.

STEVEN M. DETTELBACH  
United States Attorney

By: 

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